

Supporting Unhoused Rights Holders Working Group Meeting 3 – April 22, 2025

HRAC Members

Elizabeth McIsaac
Lindsey Lemieux
Bee Lee Soh

External Expert

Diana McNally

City Staff

Shafeeq Armstrong
Abiraa Karalasingam

Housing Secretariat Support

Meredith Kratzmann
Asha Sivarajah

The meeting of the Housing Rights Advisory Committee's Supporting Unhoused Rights Holders Working Group started at 12:30pm.

Notes

1. Key Priorities & Planning

- Reviewed and considered materials on the City's Coordinated Access System and pathways to accessing housing for people experiencing homelessness.
- Raised concerns over how the City's programs to serve unhoused people, including the Rapid Rehousing Initiative (RRHI), Priority Access to Housing and Supports (PATHS), Housing-Focused Client Supports (HFCS), can be refined to move people from being unhoused to housed. For example:
 - Can a person who is at the top of the list as part of the PATH program have ability to view the address of their new accommodation?
 - If a person has secured permanent housing through the PATH program, are they aware of whether their accommodation may be subject to rent increases (as this may result in them returning to homelessness?)
- Pathways out of homelessness cannot be 'one size fits all' because each person experiencing homelessness has different needs.
- There may be a benefit to extending coordinated access and shelter supports to other regions outside Toronto with reduced demand for community and supportive housing units. This could promote shared responsibility over addressing the needs of people experiencing homelessness across municipalities.
- Discussed the importance of creating human rights outcomes the Working Group wants to identify to hold the City accountable to move towards.
- **Next Steps:**
 - To have a more comprehensive understanding of the City's Coordinated Access system, the Working Group would like to request a consultation with staff from Toronto Shelter & Support Services. The objective of this consultation would be for the Working Group to:

- Understand how people access the shelter system and what friction points exist within the City's existing programs (RRHI, PATHS, and HFCS);
- Identify priority populations who may be left behind within the Coordinated Access system;
- Understand who the Coordinated Access system is working for and how well it is working;
- Understand how people exit homelessness and what existing data is collected to monitor this.

2. Consultation on Improving Shelter Restriction Guidance

- **Overview:**

- In follow up to this Working Group's prior engagement with staff from Toronto Shelter & Support Services on the development of its Shelter Safety Action Plan on October 7, 2024 ([HS4.2](#)), staff requested to re-engage to gain insight and feedback with respect to Action 3.1: *Improving policy guidance for the shelter sector on the use of service restrictions*.

- **Staff Presentation:**

- The objective of the consultation was to provide background and a status update on the Shelter Safety Action Plan and inform the development of improved service restriction guidance for the shelter sector, using a human rights-based analysis.

- **Working Group Discussion**

- **Access to Justice**

- Service providers overwhelmingly select 'Other' as a reason why a person is service restricted. This does not foster clear and transparent communication between providers and clients.
- The timeline for clients to appeal a service restriction must be expedited and clearly communicated.
- The restriction of services can be detrimental, especially for clients experiencing trauma and/or mental illness.
- The appeals process for a service restriction is an 'access to justice' matter, therefore, there must be a service standard when a service is restricted.
- A Restorative Justice Framework can be used to identify what happened and apply mechanisms to determine a fair outcome in a reasonable timeline.
- Drop-in centres, including The Neighbourhood Group and Sanctuary, have robust restorative justice framework, and could be consulted as part of the Service Restrictions Sector Working Group.

- **Non-Discrimination**

- Service restrictions may be written with implicit bias whereby staff imposing a service restriction may therefore also be biased
 - For example: what if a service provider is aware of previous service restrictions?
- The City's Shelter Management Information System (SMIS) should be designed to ensure that previous service restriction history does not contribute to bias against a person.

- **Habitability**

- Requesting accommodations from staff with respect to accessing basic needs within the shelter, such as clean, warm water, should be

included in the concept of service and failure to receive this understood as a service restriction.

- Staff should consult with survivors of trauma and former clients to ensure service guidance is trauma informed.
- **Human Rights-Based Feedback & Recommendations**
 - Recommended that staff look at other jurisdictions (Wales, Scotland, Ireland), which have strong human right-based frameworks with a focus on service guidance.
 - Recommend that the process begin with identifying the human rights outcomes that are relevant and build the plan from there. If a service restriction is necessary, it should be in the service of keeping people sheltered.
 - Recommend Staff to consider following questions:
 - What accountability and transparency mechanisms are put in place to mitigate bias against clients?
 - What transparency is there around client notes?
 - Are there structures in place to protect clients who wish to make complaints?
 - How can staff apply the PANEL Principles to ensure people's rights are protected throughout the process of a service restriction?
 - How can service restrictions and access to services be in alignment with a trauma-informed approach?

Meeting ended at 2:30 pm.